

**EXHIBIT A**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Application by SBC Communications, Inc.,	)	
Southwestern Bell Telephone Company, and	)	CC Docket No. 01-194
Southwestern Bell Communications Services, Inc.	)	
d/b/a Southwestern Bell Long Distance for	)	
Provision of In-Region InterLATA Services in	)	
Arkansas and Missouri	)	

**AFFIDAVIT OF DIANE BOWERS**

STATE OF IOWA                    )  
  ) ss  
COUNTY OF LINN                )

DIANE BOWERS, being first duly sworn on oath, deposes and states as follows:

1. I am over 18 years of age and I am personally familiar with the facts and circumstances stated herein and I am competent to testify thereto as a witness.
  
2. Since the issuance of the Commission's March 6<sup>th</sup> and 15<sup>th</sup> orders supporting SBC's 271 application, McLeodUSA has experienced significant problems with ordering UNE-P service from SBC. On or about March 20, 2000, McLeodUSA ordered UNE-P service from SBC for several of the new McLeodUSA customers who had chosen to switch service from SBC to McLeodUSA. Each of these customers was a subscriber to the Missouri Metropolitan Calling Area Plan ("MCA"), and each customer lost their MCA service after they were moved from SBC service to UNE-P service with McLeodUSA.

3. McLeodUSA contacted SBC promptly after learning that its customers were losing their MCA service as a result of their switch to McLeodUSA UNE-P service. SBC's initial response was that MCA service was not available to McLeodUSA with UNE-P service. Despite numerous inquiries from McLeodUSA, SBC maintained this position for over a month. Then, on or about May 1, 2001, SBC notified McLeodUSA that it did in fact offer MCA service with UNE-P service. However, it took over an additional three weeks for SBC to adequately explain the correct ordering procedure for requesting MCA service with UNE-P and to actually provision such orders correctly.

4. Even after SBC had finally explained the correct procedure for ordering MCA service with UNE-P, SBC continued to reject McLeodUSA UNE-P orders that requested MCA service until on or about May 24, 2001.

5. SBC unilaterally, and without notice to McLeodUSA or its IDSL customers, disconnected all of McLeodUSA's IDSL customers on July 18, 2001. SBC also began rejecting any new orders that McLeodUSA placed for IDSL service at or about this time.

6. Despite being contacted immediately about its improper disconnection of McLeodUSA's IDSL customers, it was not until August 7, 2001, after McLeodUSA emphatically emphasized the language in the amendment to the interconnection agreement authorizing IDSL service, that SBC finally determined that the amendment to the interconnection agreement was effective and provided notification to McLeodUSA that it would accept McLeodUSA's IDSL orders.

7. As a result 66% of McLeodUSA's IDSL customers who were disconnected on July 18, 2001 declined to reestablish DSL service with McLeodUSA.

FURTHER AFFIANT SAYETH NOT.

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DIANE BOWERS

SUBSCRIBED AND SWORN TO before me on this 10<sup>th</sup> day of September, 2001.

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Notary Public for Iowa  
Residing at Linn County  
My Commission Expires \_\_\_\_\_